

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

**AMEREN TRANSMISSION COMPANY OF  
ILLINOIS**

**Docket No. 14-0514**

**Petition for a Certificate of Public  
Convenience and Necessity, pursuant to  
Section 8-406 of the Illinois Public Utilities  
Act, and an Order pursuant to Section  
8-503 of the Public Utilities Act, to Construct,  
Operate and Maintain a New High Voltage  
Electric Service Line in the Counties of  
Peoria and Knox, Illinois.**

**REPLY BRIEF OF THE STAFF  
OF THE ILLINOIS COMMERCE COMMISSION**

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**AMEREN TRANSMISSION COMPANY OF ILLINOIS**

**Petition for a Certificate of Public Convenience and Necessity, pursuant to Section 8-406 of the Illinois Public Utilities Act, and an Order pursuant to Section 8-503 of the Public Utilities Act, to Construct, Operate and Maintain a New High Voltage Electric Service Line in the Counties of Peoria and Knox, Illinois.**

Staff of the Illinois Commerce Commission (“Staff”), by and through its undersigned counsel, pursuant to Section 200.800 of the Rules of Practice of the Illinois Commerce Commission (“Commission” or “ICC”) (83 Ill. Adm. Code 200.800), respectfully submits its Reply Brief in the instant proceeding.

On August 21, 2014, the Ameren Transmission Company of Illinois' ("ATXI" or "Company") filed a Petition requesting a Certificate of Public Convenience and Necessity ("CPCN" or "Certificate") pursuant to Section 8-406 of the Illinois Public Utilities Act ("Act"), 220 ILCS 5/8-406, and an Order pursuant to Section 8-503 of the Act, 220 ILCS 5/8-503, to Construct, Operate and Maintain a New High Voltage Electric Service Line in the Counties of Peoria and Knox, Illinois ("Petition").

The following parties intervened in the docket: Knox County Landowner Intervenor, Peoria County I-74 Landowner Intervenor, and Charles R. and Annette L. Zelnio (together, “SP Parties”), Kellie J. Tomlinson, William M. McMurtry, Thomas G. Palmer, Carol McMurtry, Trent Tomlinson, John W. Kunkle, Matt Shipley, Janet L. Shipley, Ralph and Joyce Kingdon, Robert K. and Kathleen M. Sherman, Citizens Against Route B (“CARB”), Everett L. and Grace Shissler, Joyce Best and Roger Best, and Bethany Baptist Church.

Following the submission of testimony, an evidentiary hearing was held on May 12 and 13, 2015. Initial Briefs were filed by Staff, Kellie Tomlinson, William M. McMurtry, the SP Parties, CARB, ATXI and Matt and Janet Shipley. Pursuant to the direction of the ALJs, this Reply Brief follows.

**II. REQUIREMENTS FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY**

**III. NEED FOR THE PROPOSED FACILITIES TO SERVE CUSTOMERS OR TO PROMOTE DEVELOPMENT OF A COMPETITIVE ELECTRICITY MARKET**

**IV. LEAST-COST AND THE PROPOSED TRANSMISSION LINE ROUTES**

**A. Length of the Line**

**B. Difficulty and Cost of Construction**

ATXI asserts that constructing its transmission line along either Route A or Route

B using Mr. Ramp's Alt 1 would be more costly than using its proposed unmodified route. (ATXI IB, 18.) Notwithstanding this, the Commission should adopt ATXI's Route A with the modifications proposed by Mr. Zelnio and Mr. Ramp. (Staff Ex. 2.0, 13.)

ATXI's IB shows ATXI's cost estimates for using various route alternatives. (ATXI IB, 20.) ATXI asserts that the unmodified Route A would cost approximately \$92.1 million, while Route A using both the Zelnio and Ramp Alt 1 modifications would cost approximately \$94.5 million (Zelnio adds \$0.5 million and Ramp Alt 1 adds \$1.9 million). Id. ATXI states that it does not object to Mr. Zelnio's modification, id. at 19, and has identified no obstacles that would prevent constructing the Transmission Line using the Ramp Alt 1 modifications. Id. at 22. The advantages offered by these modifications, as further explained below, warrants the additional \$2.4 million in estimated construction cost.

### **C. Difficulty and Cost of Operation and Maintenance**

ATXI does not appear to contend that there is any difference in difficulty and/or cost of operation and maintenance between the unmodified Route A as opposed to a Route A using the Zelnio and Ramp Alt 1 modifications. (ATXI IB, 23-24.) Though the modified route would be slightly longer, there would be two fewer interstate highway crossings. (Staff Ex. 2.0, 9.)

### **D. Environmental Impacts**

ATXI states that the use of Ramp Alt 1 would cross more acres of forested land and require more tree clearing, (ATXI IB, 24), which is arguably the most significant detriment to using this modification. ATXI also states Mr. Ramp's Alt 1 modification would

cause Route A to cross 10 more streams than an unmodified Route A. (ATXI IB, 24.) However, poles may not be required near the streams, so this fact does not appear to weigh against use of the Ramp Alt 1 modification.

**E. Impacts on Historical Resources**

**F. Social and Land use Impacts**

**G. Number of Affected Landowners and other Stakeholders and Proximity to Homes and other Structures**

A primary reason for adoption of Ramp Alt 1, despite its higher estimated construction cost, is that use of this modification would avoid a congested area near the intersection of I-74 and County Road 1200N. (Staff Ex. 2.0, 9.) ATXI states that the centerline of the proposed transmission line would be 200 feet from a home at this location, although Staff estimated that it would be even closer. (ATXI Ex. 22.0, 5; Staff Ex. 2.0, 9.) Use of Mr. Ramp's Alt 1 modification would result in fewer residences within 500 feet of ATXI's transmission line. (ATXI Ex. 16.0, 8-9.)

**H. Proximity to Existing and Planned Development**

**I. Community Acceptance**

**J. Visual Impact**

**K. Presence of Existing Corridors**

**V. MANAGING AND SUPERVISING THE CONSTRUCTION PROCESS**

**VI. FINANCING THE PROPOSED CONSTRUCTION**

**VII. SECTION 8-503 AUTHORITY**

**VIII. OTHER**

**IX. CONCLUSION**

For the reasons set forth *supra*, Staff respectfully requests that the Commission's Final Order in the instant proceeding reflect Staff's recommendations consistent with its Initial Brief and this Reply Brief.

Respectfully submitted,

/s/

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